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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 DANIEL GILLSON and BEVERLY
15 GILLSON

Case No.: 3:06-CV-00325-ECR-RAM

16 Plaintiffs,

17 vs.

18 SPARKS POLICE DEPARTMENT;
19 WASHOE COUNTY SHERIFF'S OFFICE;
20 TASER INTERNATIONAL, INC., an
21 Arizona Corporation; TASER
22 INTERNATIONAL, INC., a Delaware
23 Foreign Corporation; DOES I through X in
24 their individual and official capacity; DOES
25 XI through XX in their individual and
26 official capacity; DOES XXI through XXX in
27 their individual and official capacity; DOES
28 XXXI through XL in their individual and
official capacity; and ROE
CORPORATIONS XLI Through L,
inclusive,
Defendants.

**STIPULATED MOTION TO
EXTEND THE TIME FOR
PLAINTIFFS TO OPPOSE WASHOE
COUNTY SHERIFF'S OFFICE'S
MOTION TO DISMISS**

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1 **COME NOW** Plaintiffs, Daniel Gillson and Beverly Gillson, by and through their
2 counsel, Dominic P. Gentile, Charles D. Lombino, and William H. Gamage, of the Law
3 Offices of Gentile DePalma Ltd., and for their Stipulation to Extend the Time to Oppose
4 Washoe County Sheriff's Office's Motion to Dismiss.

5 Plaintiffs hereby request an extension to oppose Defendant Washoe County
6 Sheriff's Office's Motion to Dismiss. See Doc. No. 8. In support of this Stipulated
7 Motion, Plaintiff's state the following:

8 1. Plaintiffs filed their Complaint on or about June 8, 2006 with Defendant
9 Washoe County Sheriff's Office filing their Motion to Dismiss on or about July 28, 2006.

10 2. The Attorney in the Washoe County District Attorney's Office who was
11 assigned this case and drafted their Motion was DDA Gary Shannon. DDA Shannon
12 was recently promoted and had this case re-assigned to DDA Brian Brown.

13 3. Plaintiffs request a fourteen (14) day extension to oppose Defendant
14 Washoe County Sheriff's Office's Motion to Dismiss.

15 4. Plaintiffs reasonably require the extension to confer with opposing
16 counsel on the mutually desirable results from stipulating to certain aspects of their
17 Motion to Dismiss. In speaking with DDA Brown for the first time since his assignment
18 to the case, he wanted to have additional time to review the file before engaging in
19 substantive negotiations on the Motion to Dismiss.

20 5. As counsel for Defendant Washoe County Sheriff's Office, DDA Brown
21 consented to the fourteen (14) day extension of time for the Plaintiffs to oppose their
22 Motion to Dismiss.

23 6. Plaintiffs make this Stipulated Motion in good faith and not for purposes
24 of hindrance or delay but to give defense counsel sufficient time to review his newly
25 assigned file so that we might substantively agree to a stipulated resolution on their
26 pending Motion to Dismiss.

27 7. This extension will not prejudice Defendant Washoe County Sheriff's
28 Office and will likely save valuable Court time and resources since the parties can likely
come to an accommodation on the pending Motion to Dismiss.

